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12 **Counsel for Defendants SUNRISE HOSPITAL AND  
 MEDICAL CENTER, LLC, and HCA HEALTHCARE, INC.**

14  
 15 **IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF NEVADA**  
 16

17 AYNUR KABOTA, on behalf of herself and all  
 other similarly situated individuals

18 Plaintiffs,

19 v.

20 SUNRISE HOSPITAL AND MEDICAL  
 CENTER, LLC; HOSPITAL CORPORATION  
 OF AMERICA, d/b/a HCA HEALTHCARE,  
 INC.; and DOES 1 through 50, inclusive,

21 Defendants.

22 CASE NO. 2:25-cv-00684-MMD-DJA

23 **~~STIPULATION AND ORDER TO  
 EXTEND DEADLINE FOR  
 DEFENDANTS' TO ANSWER OR  
 OTHERWISE RESPOND TO  
 PLAINTIFF'S COLLECTIVE  
 AND CLASS ACTION  
 COMPLAINT (DKT. [001])~~**

24 (SECOND REQUEST)

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Pursuant to Local Rules IA 6-1, 6-2 and 7-1, Defendant Sunrise Hospital and Medical Center, LLC (“Sunrise”) and HCA Healthcare, Inc.<sup>1</sup> (“HCA”) (collectively, “Defendants”) and Plaintiff Aynur Kabota (“Plaintiff”) (the “Parties”), by and through their counsel, hereby stipulate as follows:

1. WHEREAS, Plaintiff filed her Complaint and Jury Demand on April 16, 2025. (ECF No. 1.)

2. WHEREAS, on April 22, 2025, Plaintiff served a Notice of Lawsuit and Request for Waiver of Service on Defendants and on May 1, 2025, Defendants executed the Waiver of the Service of Summons, making the deadline to answer or otherwise respond to the Complaint June 23, 2025. (ECF Nos. 5, 6.)

3. WHEREAS, on June 20, 2025, Defendants filed an Unopposed Motion for a 21-day Extension of Time to answer or otherwise respond to the Complaint. (ECF No. 7.)

4. WHEREAS, on June 24, 2025, the Court granted the Unopposed Motion for Extension of Time, making the current deadline for Defendants to answer or otherwise respond to the Complaint, July 14, 2025. (ECF No. 10.)

5. WHEREAS, the Parties are engaged in good faith efforts to explore potential early resolution of this matter. The Parties agree that a further continuance of the deadline for Defendants’ to answer or otherwise respond to the Complaint will allow the Parties to continue exploring potential resolution before either side expends significant resources.

6. WHEREAS, the Parties respectfully request that the deadline for Defendants’ to answer or otherwise respond to the Complaint be extended sixty (60) days, up to and including September 12, 2025.

7. This stipulation is made in good faith and not for any improper purpose or delay.

Based on the foregoing, IT IS HEREBY STIPULATED AND AGREED by and

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<sup>1</sup> HCA Healthcare, Inc. is improperly identified in the complaint as “Hospital Corporation of America d/b/a HCA Healthcare, Inc.” There is no such legal entity. Further, it is improperly identified as a defendant in this action; at all times, Sunrise was the proper employing entity of Plaintiff. HCA Healthcare, Inc. is a holding company which has no employees.

1 between the Parties through their respective counsel of record herein and subject to Court  
 2 order that the deadline for Defendant to answer or otherwise respond to the Complaint is  
 3 continued from July 14, 2025 to **September 12, 2025**.

4 This Stipulation is made in good faith and is not intended for purposes of delay.

5 Respectfully submitted this 14<sup>th</sup> day of July 2025.

6 **THIERMAN BUCK**

7 **GREENBERG TRAURIG, LLP**

8 By: */s/ Leah L. Jones*

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12 ***Counsel for Plaintiff and all  
 13 Similarly Situated Individuals***

14 By: */s/ Kara B. Hendricks*

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18 ***Counsel for Defendants SUNRISE  
 19 HOSPITAL AND MEDICAL CENTER,  
 LLC, and HCA HEALTHCARE, INC.***

20 **ORDER**

21 **IT IS SO ORDERED.**

22   
 23 DANIEL J. ALBREGTS  
 UNITED STATES MAGISTRATE JUDGE

24  
 25 DATED: July 15, 2025  
 26  
 27  
 28

**CERTIFICATE OF SERVICE**

I hereby certify that on **July 14, 2025**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

*/s/ Evelyn Escobar-Gaddi*

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